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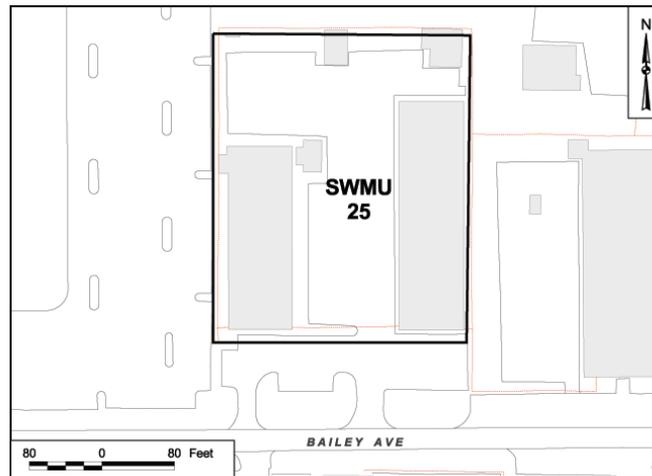
FINAL STATEMENT OF BASIS FOR SOLID WASTE MANAGEMENT UNIT 25 ATLANTIC
MARINE NS MAYPORT FL
9/4/2008
NAVAL STATION MAYPORT

STATEMENT OF BASIS
SWMU 25 – Atlantic Marine, Inc.
Naval Station Mayport
Mayport, Florida



USEPA ID #FL9 170 024 260

September 4, 2008



Facility/Unit Type: Naval Station

Contaminants: Soil - Aldrin and Dieldrin; Groundwater - Arsenic, Antimony, Silver, and Zinc

Media: Soil and Groundwater

Corrective Action: Soil - Capping and Land Use Controls; Groundwater - Land Use Controls and Groundwater Monitoring

SUMMARY

The proposed **corrective measure** at **Solid Waste Management Unit (SWMU) 25** at Naval Station (NAVSTA) Mayport is capping, **Land Use Controls (LUCs)**, and groundwater monitoring. SWMU 25, the former location of Atlantic Marine, Inc., has been impacted by aldrin and dieldrin in **surface soil** and **subsurface soil**. The groundwater for SWMUs 1, 23, 24, and 25 were grouped together and assessed collectively during the **Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI)**. The **chemicals of concern (COCs)** in groundwater at the SWMU are the metals antimony, arsenic, silver, and zinc. LUCs will restrict the site to non-residential land use only and will also prohibit any soil disturbance, excavation, or removal activities unless prior written approval is obtained from the NAVSTA Mayport Environmental Department in accordance with the NAVSTA Mayport excavation permit process. No surface water exists at SWMU 25.

Non-residential land use restrictions prohibit residential or residential-like uses including, but not limited to, any form of housing; childcare facilities; any kind of school

including pre-schools, elementary schools, and secondary schools; playgrounds; and adult convalescent and nursing care facilities.

LUCs for groundwater will prohibit groundwater use/extraction and will also prohibit any interference with groundwater monitoring systems at SWMU 25. The imposition of LUCs would serve to protect human health by prohibiting the use of groundwater until contaminant concentrations allow for unrestricted use and unlimited exposure. Additionally, sampling and analysis of downgradient wells will be implemented to assess COC attenuation in groundwater.

The public is invited to comment on this proposed remedy or any other corrective measure alternatives, including those not previously studied. Information on how the public may participate in this decision-making process is provided in the Public Participation section of this document.

INTRODUCTION

Pursuant to RCRA, as amended by the 1984 **Hazardous and Solid Waste Amendments (HSWA)**,

Final

the **Florida Department of Environmental Protection (FDEP)** issued the current HSWA **permit** to NAVSTA Mayport on August 30, 2005.

This **Statement of Basis (SB)** identifies the proposed corrective measure for SWMU 25 and explains the rationale for its selection, describes all alternatives evaluated as part of the **Corrective Measures Study (CMS)**, solicits public review and comment on all alternatives, and provides information as to how the public can be involved in the remedy selection process. Additional details regarding the facility, the investigations conducted under the RFI, and the evaluation of the corrective measure alternatives may be found in the RFI, CMS, and CMS Addendum Reports. These documents are kept as part of the Administrative Record at the **Information Repository**. Refer to the Public Participation section of this document for their location. A glossary, which defines some of the technical terms contained herein, is included at the end of this document.

The corrective measures reflected in this SB are those proposed by the United States Navy (Navy) and FDEP for implementation at SWMU 25. Changes to the proposed corrective measure or a change from the proposed corrective measure to another alternative may be made if public comments or additional data indicate that such a change would result in a more appropriate solution.

PROPOSED CORRECTIVE ACTION

The proposed corrective measure for surface soil and subsurface soil includes capping and LUCs. The LUCs for soil at SWMU 25 will restrict use of the parcel to non-residential use, prohibit unauthorized soil disturbance, and ensure that no unauthorized disturbance of any concrete or asphalt covered areas occurs. Non-residential land use restrictions prohibit residential and residential-like uses which includes, but is not limited to, any form of housing, child-care facilities, pre-schools, elementary schools, secondary schools, playgrounds, or full-time adult convalescent or nursing care facilities. The total present worth cost of the proposed soil corrective measure is \$155,000, which includes a \$86,000 capital cost and an operation and maintenance cost of \$69,000 over a 30-year period.

The proposed corrective measure for groundwater is LUCs and groundwater monitoring. LUCs for groundwater prohibit groundwater use/extraction and would also prohibit any interference with groundwater monitoring systems at the SWMU. The imposition of LUCs would serve to protect human health by prohibiting the use of the groundwater until contaminant

concentrations allow for unrestricted use and unlimited exposure. Additionally, sampling and analysis of downgradient wells will be implemented to assess COC attenuation in groundwater. The total present worth cost of the proposed groundwater corrective measure is \$259,000, which includes a \$47,000 capital cost and an operation and maintenance cost of \$212,000 over a 30-year period.

As required by NAVSTA Mayport's RCRA permit, the Navy will develop a **Corrective Measures Implementation Plan (CMIP)**, with FDEP concurrence, for this SWMU following selection of the final corrective measure. The CMIP will specify procedures for the future long-term oversight and maintenance of the LUCs to be imposed at SWMU 25. The facility will ensure that these or similar instructions, processes, and requirements are complied with for all activities at SWMU 25 under the NAVSTA Mayport site approval process and/or the excavation permit process. NAVSTA Mayport will also conduct periodic inspections to confirm that the LUCs are complied with and report the results of those inspections to the FDEP. All processes, site inspections, and reporting activities will be conducted pursuant to specific requirements to be set forth in an approved CMIP for the site. The proposed LUC corrective action at SWMU 25 will ensure future protection of human health and the environment.

FACILITY BACKGROUND

NAVSTA Mayport is located near the town of Mayport within the city limits of Jacksonville, Florida, in northeastern Duval County on the southern shore of the confluence of the St. Johns River and the Atlantic Ocean (see Figure 1).

Figure 1. Naval Station Mayport Location Map

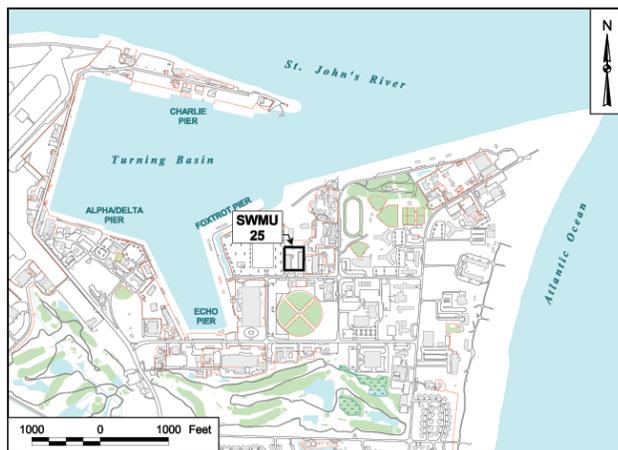


SWMU 25 (see Figure 2), the former location of Atlantic Marine, Inc., has been operational since 1980. NAVSTA Mayport leased this 1.5-acre property to Atlantic Marine

to conduct the maintenance and repair of Navy ships under contract to the Supervisor of Shipbuilding, Conversion, and Repair. Activities at Atlantic Marine, Inc. include abrasive media stripping, fabrication of metal parts, metal working, degreasing, paint stripping, welding, automotive maintenance and repair, as well as other ship support operations. Contaminants could have potentially been released from oils used in milling of parts, heavy metals in paints, solvents used in cleaning parts, and fuel storage.

The RFI field activities were conducted from March through October 1995, and the RFI report was submitted in 1996. Field activities consisted of the collection and analysis of surface and subsurface soil samples, sediment, and the installation and sampling of groundwater monitoring wells.

Figure 2. SWMU 25 Location Map



SUMMARY OF FACILITY RISKS

A **Human Health Baseline Risk Assessment** and an Ecological Risk Assessment were performed as part of the RFI. In addition, human health risks were considered further in the CMS and CMS Addendum. An exceedance of an FDEP or **United States Environmental Protection Agency** (USEPA) risk level indicates a potential concern for the SWMU. Recommendations made based on human health and ecological receptor risks due to exposure to soil and groundwater were based on the collective assessment of samples from SWMUs 1, 23, 24, and 25.

Human Health Baseline Risk Assessment

Preliminary risk characterization for SWMUs 1, 23, 24, and 25 was conducted for potential exposures to surface soil, subsurface soil, and groundwater under current and future land-use scenarios.

Soil. Noncancer risks associated with surface soil ingestion, dermal contact, and inhalation of fugitive dust for current and future land use are below USEPA's and FDEP's target Hazard Index of 1.

Aldrin and dieldrin were determined to be surface soil and subsurface soil COCs based upon exceedances of the FDEP Soil Cleanup Target Levels (SCTLs) for industrial direct exposure.

The maximum concentration of aldrin in surface soil is 0.52 mg/kg, which is above the FDEP SCTL for industrial direct exposure of 0.3 mg/kg. The maximum concentrations of dieldrin are 3.1 mg/kg in surface soil and 3.0 mg/kg in subsurface soil, which is above the FDEP SCTL for industrial direct exposure of 0.3 mg/kg.

Aside from aldrin and dieldrin, no other contaminants exceeded the FDEP SCTLs for residential or industrial direct exposure.

Groundwater. A comparison to FDEP Groundwater Cleanup Target Levels (GCTLs) concluded that antimony, arsenic, silver, and zinc are COCs for SWMUs 1, 23, 24, and 25. The human health risk assessment concluded that there are cancer and non-cancer risks to human health associated with hypothetical future residents. However, based on the current use of SWMU 25, there is no human health exposure to groundwater, and it is unlikely that there will any exposure during future use.

Ecological Assessment

Based on the Ecological Risk Assessment (ERA) findings, no risk to terrestrial wildlife populations was determined to be likely due to exposure to surface soil. No pathway for ecological exposure to subsurface soil was identified in the ERA. Additionally, the ERA found groundwater discharge into St. Johns River did not pose a risk to aquatic receptors including fish, amphibians, plants, and invertebrates.

INTERIM MEASURES

Land Use Controls. LUCs were implemented as an **interim measure** to restrict the SWMUs to industrial use.

SCOPE OF CORRECTIVE ACTION

Contaminants in surface soil and subsurface soil that exceed the residential SCTLs in Chapter 62-777, *Florida Administrative Code* (FAC), are aldrin and dieldrin. The corrective action for soil at SWMU 25 is

to address 22 cubic yards (yd³) of aldrin and dieldrin contaminated surface soil and 7 yd³ of aldrin and dieldrin contaminated subsurface soil (see Figure 3).

The corrective action will include a cap and LUCs. LUCs for soil will restrict use of the parcel to non-residential use, prohibit unauthorized soil disturbance, and ensure that no unauthorized disturbance of any asphalt or concrete covered areas occurs (see Figure 4).

Antimony, arsenic, silver, and zinc in groundwater exceed the GCTLs in Chapter 62 777, FAC. LUCs will be required for the SWMU until contaminant concentrations allow for unrestricted use and unlimited exposure.

The estimated volume of groundwater contamination is approximately 1,900,000 gallons [an estimated area of 73,500 square feet (ft²)] of contaminated groundwater (see Figure 5).

Figure 3. SWMU 25 Soil Contamination Area

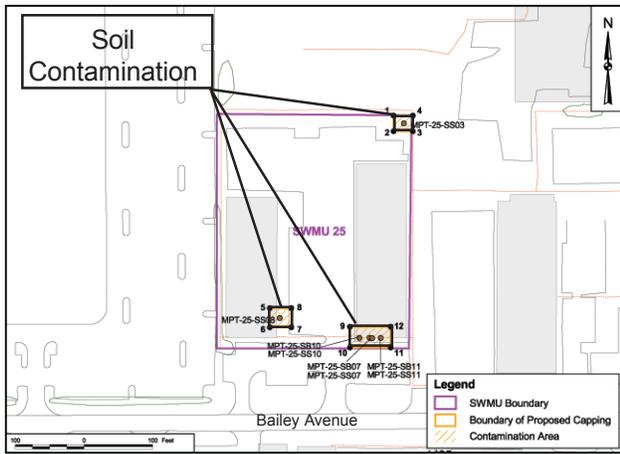
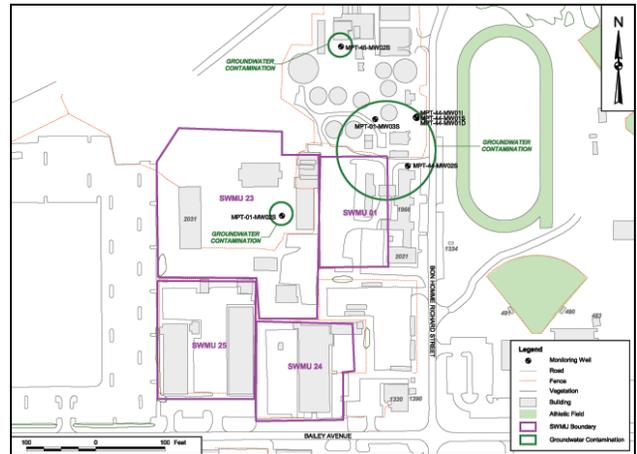


Figure 4. SWMU 25 Proposed Corrective Action



Figure 5. SWMU 25 Groundwater Contamination



SUMMARY OF ALTERNATIVES

An evaluation of the corrective measure alternatives for SWMU 25 was conducted in accordance with the Final RCRA Corrective Action Plan Guidance [USEPA, May 31, 1994, Office of Solid Waste and Emergency Response (OSWER) Directive 902.3-2A] as follows:

Soil Alternative 1: No Action. The **No Action** alternative serves as a baseline consideration or addresses SWMUs that do not require remediation.

Soil Alternative 2: LUCs. This alternative would implement LUCs to restrict the site to non-residential land use only, and it would also prohibit any unauthorized surface and subsurface soil disturbance. Non-residential land use restrictions prohibit residential or residential-like uses including, but not limited to, any form of housing, child-care facility, preschools, elementary schools, secondary schools, playgrounds, and adult convalescent or nursing home facilities. Once implemented, procedures would be set in place to ensure that the LUCs continue to be maintained via preparation of a SWMU-specific CMIP as required by NAVSTA Mayport's RCRA permit.

Soil Alternative 3: Capping and LUCs. This alternative would address the principal threats posed by contaminated surface soil and subsurface soil through a cover that would protect humans and ecological receptors from direct contact and would also reduce infiltration. This would also reduce the potential for contaminants to leach into the underlying **aquifer**. LUCs would be identical to those discussed under Soil Alternative 2.

Capping involves covering those areas not presently covered with a layer of asphalt. The estimated area requiring capping is approximately 1,280 ft².

Soil Alternative 4: Excavation and Disposal. Soil Alternative 4 would reduce long-term management by addressing contaminated surface soil through excavation and disposal. This alternative would offer aggressive remediation through excavation and transportation of contaminated soil to a hazardous waste landfill. An estimated 215 yd³ of soil would be excavated for disposal.

Excavation would involve the removal of up to 4 feet of soil not presently covered that exceeds industrial SCTLs for disposal in an approved offsite facility.

Groundwater Alternatives

Groundwater Alternative 1: No Action. The No Action alternative serves as a baseline consideration or addresses SWMUs that do not require remediation.

Groundwater Alternative 2: LUCs and Groundwater Monitoring. This alternative would impose LUCs in the form of a groundwater use/extraction prohibition, and it would also prohibit any interference with groundwater monitoring systems at the SWMU. The imposition of groundwater LUCs would serve to protect human health by prohibiting the use of groundwater until contaminant concentrations allow for unrestricted use and unlimited exposure. Additionally, sampling and analysis of downgradient wells will be implemented to assess COC attenuation in groundwater. Details for putting procedures in place to ensure LUCs continue to be maintained are discussed under Soil Alternative 2.

Groundwater Alternative 3: Extraction, Ex-Situ Treatment, and Discharge. This alternative would consist of installing a separate collection system and the collected groundwater would be transported to a centralized location wherein the water would be treated. A groundwater extraction system would be installed to address the contaminated water through ex-situ treatment using precipitation, filtration, and granular activated carbon, and adsorption for metals removal.

An estimated 5.7 million gallons of groundwater would be extracted, passed through a liquid-phase treatment system, and discharged to NAVSTA Mayport's sewage treatment plant under a National Pollutant Discharge Elimination System discharge permit.

EVALUATION OF THE PROPOSED CORRECTIVE ACTION AND ALTERNATIVES

The identified corrective measure alternatives were evaluated using the criteria contained in the Final RCRA Corrective Action Plan (USEPA, May 31, 1994, OSWER Directive 902.3-2A). Four criteria and five other factors were used to evaluate this and the other corrective measure alternatives. These criteria and factors are as follows:

Criteria

- Protect Human Health and the Environment
- Attain Media Cleanup Standards
- Source Control
- Comply with Waste Management Standards

Other Factors

- Long-Term Reliability and Effectiveness
- Reduction in Toxicity, Mobility, or Volume
- Short-Term Effectiveness
- Implementability
- Cost

Tables 1 and 2 depict the evaluation of the corrective measure alternatives as performed in the CMS and CMS Addendum Reports.

RECOMMENDATIONS

Based on the screening of technologies and assessment of various alternatives performed, Soil Alternative 3 is preferred for addressing the surface soil and subsurface soil contamination and Groundwater Alternative 2 is preferred for addressing groundwater contamination.

The preferred soil corrective measure alternative involves placing a cap on the surface soil areas that exceed FDEP SCTLs (see Figure 3) and are not presently covered to prohibit direct contact and reduce leaching. LUCs would be implemented to prohibit any unauthorized surface and subsurface soil disturbance. LUCs would also restrict the use of the parcel to non-residential and would ensure no unauthorized disturbance of asphalt or concrete covered areas. Soil Alternative 3 is moderately aggressive in addressing the contamination and should provide a cost effective corrective measure in approximately 1 year.

Non-residential land use restrictions prohibit residential or residential-like uses including, but not limited to, any form of housing; childcare facilities; any kind of school including pre-schools, elementary schools, and

TABLE 1. EVALUATION OF SOIL CORRECTIVE MEASURE ALTERNATIVES FOR SWMU 25

Soil Alternative 1: No Action	Soil Alternative 2: LUCs	Soil Alternative 3: Capping and LUCs	Soil Alternative 4: Excavation and Disposal
Protect Human Health and the Environment			
Would not be protective.	LUCs would prevent future residential use of the SWMU.	Would prevent direct human or ecological contact with soil and reduce potential leaching.	All organic contaminants would be eliminated through excavation.
Attain Media Cleanup Standards			
Would not attain.	LUCs would not attain clean-up standards for residential use. LUCs would allow for the management of unacceptable risks.	Would prevent the risk of direct exposure and lessen the potential leaching to groundwater. Attains standards in less than 1 year.	Removal would attain cleanup standards in less than 1 year.
Source Control			
No new source control would be implemented.	No new source control would be implemented.	A cap would control the source of contamination and reduce leaching.	Excavation and disposal of the contaminated soil would eliminate the source.
Waste Management Standards			
No waste would be generated.	No standards for management of wastes would apply.	Waste would be properly disposed of in accordance with applicable State, Federal, and local regulations.	Waste would be properly disposed of in accordance with applicable State, Federal, and local regulations.
Long-Term Reliability and Effectiveness			
Residential contamination and existing risks would remain if the SWMU is used for residential purposes.	Residential contamination and existing risks would remain if the SWMU is used for residential purposes.	A cap would provide long-term reliability and effectiveness.	The degree of long-term reliability and effectiveness would be high.
Reduction in Toxicity, Mobility, or Volume through Treatment			
Reduction of toxicity would occur through natural processes, but would not be monitored.	Reduction of toxicity would occur through natural processes, but would not be monitored.	A cap would reduce mobility. Toxicity or volume would be reduced through natural processes.	Mobility of all contaminants would be reduced through excavation.
Short-Term Effectiveness			
No short-term risks to workers, the community, or the environment.	No short-term risks to workers, the community, or the environment.	Short-term risk would be controllable.	Short-term risk would be controllable, but dust would be of concern during construction.
Implementability			
Would be readily implementable.	Would be readily implementable.	Would be readily implementable.	Would be implementable.
Cost (Total Present Worth)			
\$0	\$84,000	\$155,000	\$284,000

Shading indicates Proposed Alternative.

secondary schools; playgrounds; and adult convalescent and nursing care facilities.

The preferred groundwater corrective measure alternative involves LUCs and groundwater monitoring to address groundwater contamination. LUCs would prohibit the use of the groundwater until contaminant concentrations allow for unrestricted use and unlimited exposure. Additionally, sampling and analysis of downgradient wells will be implemented to assess COC attenuation in groundwater.

PUBLIC PARTICIPATION

To make a final decision and incorporate a corrective measure into the HSWA permit, the Navy is soliciting public review and comment on this SB for the proposed corrective measure for SWMU 25 at NAVSTA Mayport. The regulations under *40 Code of Federal Regulations* (CFR) 124.10(6) require a 45-day comment period for a permit modification request made

by the permittee under RCRA. The FDEP has undertaken the lead role on this request initiated by the Navy (the permittee). The comment period will be published in the *Florida Times Union* newspaper, and will end on September 28, 2008.

Copies of the RFI and CMS Reports, and the SB will be available for public review at the Information Repository located at the Jacksonville Public Library - Beaches Branch, 600 3rd Street, Neptune Beach, FL, 32266 [Phone (904) 241-1141].

A public hearing will be held if one is requested. To request a public hearing, to obtain more information about this SB, or to submit written comments, please contact Diane Racine or John Winters (contact information provided on Page 7).

All comments must be postmarked no later than November 12, 2008.

TABLE 2. EVALUATION OF GROUNDWATER CORRECTIVE MEASURE ALTERNATIVES FOR SWMUs 1, 23, 24, and 25

Groundwater Alternative 1: No Action	Groundwater Alternative 2: LUCs and Groundwater Monitoring	Groundwater Alternative 3: Extraction, Ex Situ Treatment, and Discharge
Protect Human Health and the Environment		
Not protective.	Would be protective.	Would be protective.
Attain Media Cleanup Standards		
Would not comply.	LUCs would not attain clean-up standards for residential use. LUCs would allow for management of unacceptable risks.	Groundwater extraction would attain standards in approximately 7 years.
Source Control		
No new source control would be implemented.	No new source control would be implemented.	Groundwater extraction and treatment would eliminate the groundwater contamination.
Waste Management Standards		
No standards applicable.	No applicable standards.	Waste would be disposed of in accordance with applicable State, Federal, and local regulations.
Long-Term Reliability and Effectiveness		
Contamination and existing risks would remain.	LUCs would prohibit the use of the groundwater until contaminant concentrations allow for unrestricted use and unlimited exposure.	Would provide long-term reliability and effectiveness.
Reduction in Toxicity, Mobility, or Volume through Treatment		
Natural processes would reduce toxicity, but would not be monitored.	Natural processes would reduce toxicity, but would not be monitored.	Treatment would reduce toxicity, mobility, and volume.
Short-Term Effectiveness		
Would not pose new risk.	Short-term risks would be minimal.	Short-term risks would be controllable.
Implementability		
Would be readily implementable.	Would be readily implementable.	Would be implementable.
Cost (Total Present Worth)		
\$0	\$259,000	\$4,676,000

Shading indicates Proposed Alternative.

Next Steps

Unless otherwise indicated, the FDEP will modify the HSWA permit to incorporate the final decision pursuant to the RCRA permit modification request when the permit is renewed. The final decision will detail the corrective measure chosen for SWMU 25 and will include responses to comments received during the **public comment period** in a **Response to Comments Summary**.

When the permit is modified, notice will be given to the Navy and to each person who has submitted written comments or who has requested notice of the final decision. The final permit decision shall become effective 30 days after the issuance of the notice of the decision unless a later date is specified or review is requested under 40 CFR 124.19. If no comments are received requesting a change in the draft permit, the final permit modification shall become effective immediately upon issuance.

Contact Persons

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KEY WORDS

CFR	Code of Federal Regulations	Navy	United States Navy
CMIP	Corrective Measures Implementation Plan	NAVSTA	Naval Station
CMS	Corrective Measures Study	OSWER	Office of Solid Waste and Emergency Response
COC	Chemical of Concern	RCRA	Resource Conservation and Recovery Act
ERA	Ecological Risk Assessment	RFI	RCRA Facility Investigation
FAC	Florida Administrative Code	SB	Statement of Basis
FDEP	Florida Department of Environmental Protection	SCTL	Soil Cleanup Target Level
ft ²	Square Feet	SWMU	Solid Waste Management Unit
GCTL	Groundwater Cleanup Target Level	USEPA	United States Environmental Protection Agency
HSWA	Hazardous and Solid Waste Amendments	yd ³	Cubic Yards
LUC	Land Use Control		
MNA	Monitored Natural Attenuation		

GLOSSARY

Aquifer: An underground layer of permeable rock, sediment, or soil capable of storing and transporting water within cracks and pore spaces or between grains.

Chemical of Concern (COC): A chemical detected in environmental media at a concentration that may adversely affect human health or ecological receptors.

Corrective Measure: Includes corrective action necessary to protect human health and the environment for releases of hazardous constituents from any SWMU at the facility regardless of the time at which waste was placed at the location as required by 40 CFR 264.101. Actions may address releases to air, soils, surface water, or groundwater.

Corrective Measures Implementation Plan (CMIP): A written plan that outlines detailed design, construction, operation, maintenance, and monitoring of a chosen cleanup corrective action.

Corrective Measures Study (CMS): A step in the RCRA corrective action process where the owner and operation identifies and evaluates cleanup alternatives for addressing contamination at a SWMU

Florida Department of Environmental Protection (FDEP): The state agency responsible for implementing Florida environmental laws.

Groundwater: Water found within an aquifer.

Hazardous and Solid Waste Amendments (HSWA): Amendments to RCRA, passed in 1984, which greatly expand the nature and complexity of activities covered under RCRA.

Human Health Baseline Risk Assessment: Study to determine the likelihood that a given exposure or series of exposures may have damaged or will damage human health.

Information Repository: A public file containing technical reports, reference documents, and other materials relevant to the SWMU investigation and clean-up.

Land Use Control (LUC): Is broadly interpreted to mean any restriction or control arising from the need to protect human health and the environment, that limits use of and/or exposure to any portion of a given property, including water resources. This term encompasses institutional controls, such as those involving real estate interests, governmental permitting, zoning, public advisories, deed notices, and other legal restrictions. The term may also include restrictions on access, whether achieved by means of engineered barriers such as a fence or concrete pad, or by human means, such as the presence of security guards. Additionally, the term may involve both affirmative measures to achieve the desired restriction (e.g., night lighting of an area) and prohibitive directives (e.g., no drilling of drinking water wells).

Permit: A RCRA permit, issued for NAVSTA Mayport, establishes the facility's operating conditions for managing hazardous waste.

Public Comment Period: A legally required opportunity for the community to provide written and oral comments on a proposed environmental action at a hazardous waste site.

GLOSSARY CONTINUED

RCRA Facility Investigation (RFI): Evaluates the nature and extent of the releases of hazardous waste.

Resource Conservation and Recovery Act (RCRA) of 1976: Requires each hazardous waste treatment, storage, and disposal facility to manage hazardous waste in accordance with a permit issued by the USEPA or a state agency that has a hazardous waste program approved by the USEPA.

Response to Comments Summary: A document summarizing the public comments received and the responses to the comments.

Risk Assessment: A study estimating the potential risk a site poses to human health and the environment.

Solid Waste Management Unit (SWMU): Any discernable unit (to include regulated units) at which RCRA regulated waste has been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste.

Statement of Basis (SB): A public participation document detailing the proposed remedial action at a site.

Surface Soil: Soil found from 0 to 2 feet below land surface.

Subsurface Soil: Soil found 2 feet below land surface and deeper.

Unauthorized: An act done or made without official permission or consent.

United States Environmental Protection Agency (USEPA): The federal agency responsible for implementing United States environmental laws.

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**Comments on the Statement of Basis for
Atlantic Marine, Inc. (SWMU 25)**

Place
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